

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Designation of 211 and 511 as)	CC Docket No. 92-105
Abbreviated Dialing Codes)	

COMMENTS OF NENA

The National Emergency Number Association (“NENA”) hereby responds to the invitation to comment on the status of 2-1-1 and 5-1-1 implementation as abbreviated dialing codes¹. 2-1-1 has been designated as a number to be used for access to community information and referral services and 5-1-1 has been designated as a number to be used for traveler information services. The Notice seeks comments on whether the dialing codes are being utilized in the manner for which they were assigned and, if the codes are not widely used, what the Commission can do to facilitate more widespread use.

We will leave those directly involved in the provisioning of 2-1-1 and 5-1-1 to comment on whether the codes are being used for their intended purpose. Our comments will focus primarily on the relationship between other N-1-1 numbers and 9-1-1, some of the common issues that 9-1-1 shares with other N-1-1 numbers and what the Commission can do to facilitate solutions which we believe will ultimately facilitate more effective and, therefore, more widespread use.

¹ Public Notice, DA 07-2017, May 7, 2007.

NENA has been pleased over the past several years to work more closely with organizations responsible for the implementation of N-1-1 services. Such interaction has come through the NENA Next Generation Partner Program² and through an ongoing effort to establish a forum for all entities involved in the provisioning of N-1-1 and national 800 number emergency services. We have appreciated the Commissions active participation in both of these activities and encourage continued participation.

One of the benefits of 2-1-1 is that if the public is properly educated on the use of 2-1-1 (and other N-1-1 services like 3-1-1), this can reduce the burden on Public Safety Answering Points (PSAPs) who will not be asked to respond to calls for assistance that are not true 9-1-1 emergencies. At the same time there will be situations when a call to 2-1-1 or a suicide hotline is a true life-threatening emergency and needs to get routed to the appropriate local PSAP. Thus, NENA supports the further deployment of these services and believes that it is essential for all of the N-1-1 groups, and the Commission, to work together to develop common solutions to the call-routing challenges presented to 9-1-1 and other N-1-1s by new technologies. 2-1-1, other N-1-1 numbers and other services, such as poison control centers and suicide hotlines using 800 numbers for state/regional routing, are having routing difficulties today with emerging communications services. With increasing wireless (roaming) and VoIP (particularly nomadic) use by the public, access and routing to the correct state, regional, or local answering point is a

² <http://www.nena.org/pages/ContentList.asp?CTID=14>

challenge.

Just as there will be unique automatic location and call/information routing issues for PSAPs as the 9-1-1 system migrates to an IP-based Next Generation 9-1-1 system, it is increasingly apparent that there is also a need for a next generation access/routing method for all N-1-1s. NG9-1-1 technical and operational requirements, architecture and standards

development include the premise that what is being developed for future 9-1-1 can also be utilized by these other important services. This premise will also allow full interoperability, where applicable, between these various N-1-1 services, so that calls (including data & video) can be transferred or relayed between such services to the correct answering point. It is important that the FCC encourage this Next Generation concept and take steps within its purview to help.

Properly developed and implemented, this Next Generation concept will enable complete public access, including those using video and text devices, such as the deaf, hard-of-hearing and the speech-impaired. It is important that no one be left behind as the public increasingly adapts and uses newer communications devices/services. It is also important that the FCC consider steps it can take prior to development of this Next Generation concept.

These steps include:

- Ensure that telecommunications providers complete all needed translations and routing processes, in areas where 2-1-1 and/or 5-1-1 are active or being implemented.
- Consider granting 2-1-1 priority service and repair during power outages and crises. In times of disaster, this service provided for the public good is becoming increasingly important.
- Provide support for next generation call routing capabilities which is increasingly important with the growing relationship between 9-1-1 and 2-1-1 during emergencies/disasters.

Respectfully submitted,

NENA

By_____

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